



CHARLES H. CHEVALIER  
Director

Gibbons P.C.  
One Gateway Center  
Newark, New Jersey 07102-5310  
Direct: (973) 596-4611 Fax: (973) 639-6263  
cchevalier@gibbonslaw.com

March 19, 2024

**VIA ECF**

Honorable Tonianne J. Bongiovanni, U.S.M.J.  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re:    *AstraZeneca Pharm. LP v. Natco Pharma Ltd.*, Civil Action No. 3:23-796  
      (RK) (TJB);  
      *AstraZeneca Pharm. LP v. Sandoz Inc.*, Civil Action No. 3:24-641 (RK)  
      (TJB)**

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Dear Judge Bongiovanni:

Our firm, together with Williams & Connolly LLP, represents Plaintiffs AstraZeneca Pharmaceuticals LP, AstraZeneca UK Limited, Kudos Pharmaceuticals Limited, The University of Sheffield, and MSD International Business GmbH in the above-referenced matters. With Midlige Richter, LLC and Rakoczy Molino Mazzochi Siwik LLP, counsel for Defendants Natco Pharma Ltd. and Natco Pharma, Inc. (collectively, “Natco”), and with Hill Wallack LLP and Crowell & Moring LLP, counsel for Defendant Sandoz Inc. (“Sandoz”), we jointly submit the attached Stipulation and [Proposed] Order of Consolidation for the Court’s consideration.

As Your Honor is aware, Plaintiffs filed a complaint against Natco on February 10, 2023 (3:23-cv-796, ECF No. 1). Your Honor conducted a Rule 16 conference with Plaintiffs and Natco on June 5, 2023 (3:23-cv-796, ECF No. 15) and entered a Letter Order on June 9, 2023 setting the schedule in that matter (3:23-cv-796, ECF No. 31; amended at ECF No. 53). The next scheduled event is Natco’s disclosure of its invalidity/noninfringement contentions currently due on April 12, 2024. (*Id.*)

As Your Honor is also aware, Plaintiffs filed a complaint against Sandoz on February 2, 2024 (3:24-cv-641, ECF No. 1). Sandoz has yet to answer the complaint (*see* 3:24-cv-641, ECF No. 9) and the Rule 16 conference has not yet been scheduled. However, Plaintiffs, Natco, and Sandoz have conferred and agreed that in order to conserve the parties’ and the Court’s time and resources it makes sense to consolidate these matters for all pretrial purposes. Once the matters are consolidated for those purposes, the parties will submit an amended pretrial schedule to address the remaining pleadings and initial disclosures between Plaintiffs and Sandoz while consolidating contention and claim construction disclosures for all parties. If this proposal is acceptable, the parties respectfully request that Your Honor “So-Order” the attached Stipulation and [Proposed] Order of Consolidation and direct its entry on the docket. Within one-week of its entry the parties

GIBBONS P.C.

March 19, 2024

Page 2

will submit a proposed amended pretrial scheduling order and a supplemental stipulated confidentiality order for Your Honor's consideration.

If the Court would like to discuss this matter further, the parties will make themselves available at the Court's convenience. We thank the Court for its consideration and assistance in these matters.

Respectfully submitted,

s/ Charles H. Chevalier

Charles H. Chevalier

Attachment

cc: All counsel of record via ECF and email